

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
Blakeley E. Griffith, Esq.
Nevada Bar No. 12386
Kiah D. Beverly-Graham, Esq.
Nevada Bar No. 11916
SNELL & WILMER L.L.P.
3883 Howard Hughes Pkwy, #1100
Las Vegas, Nevada 89169
Telephone: 702-784-5200
Facsimile: 702-784-5252
Email: asorenson@swlaw.com
bgriffith@swlaw.com
kbeverly@swlaw.com

Attorneys for Defendant Bank of America, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and
JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINES FOR
BRIEFING ON DISCOVERY
MOTIONS**

(SECOND REQUEST)

Pursuant to Local Rule IA 6-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services (“Plaintiffs”) and Defendant Bank of America, N.A. (“BANA” and together with Plaintiffs the “Parties” and each a “Party”), through their counsel of record hereby stipulate to a modest

1 extension of existing briefing deadlines in connection with (i) Plaintiffs' Motion to Compel
2 Discovery and For Attorney's Fees (ECF No. 48), filed under seal on May 26, 2020 ("Motion to
3 Compel") and (ii) Plaintiffs' Motion to Unseal Court Documents (ECF No. 52) filed on June 4,
4 2020 ("Motion to Unseal"). The Parties respectfully request the Court enter this Stipulation as an
5 Order. In support of this request, the Parties represent as follows.

6 Plaintiffs' motions raise a number of complex issues of fact and law. The Parties agree
7 that there is good cause for the modest extension of the briefing schedule requested herein in
8 order to allow them further time to analyze these issues and prepare an appropriate response or
9 papers in further support. In addition, the ongoing effects of the COVID-19 pandemic continue to
10 affect the ability of the parties and their counsel to respond to the motions at issue. In particular,
11 the BANA employees with the knowledge of the relevant facts continue to operate from a remote
12 environment which limits ability to research the factual issues raised in the motion. Counsel faces
13 similar issues, which also pose challenges related to child care.

14 The Parties agree that the foregoing constitutes good cause to extend the deadlines as
15 requested herein. This is the Parties' second request for an extension of the deadlines related to
16 the Motion to Compel and their first request for an extension of the deadlines related to the
17 Motion to Unseal. The Parties agree that the requested extensions will not prejudice any Party. No
18 deadline for which an extension is requested herein has expired.

19 Accordingly, the Parties agree there is good cause for entry of the following new
20 deadlines:

21 1. BANA's time to file papers in response to the Motion to Compel is extended from
22 June 16, 2020 to June 22, 2020;

23 2. Plaintiffs' time to file reply papers in further support of the Motion to Compel is
24 extended from June 26, 2020 to July 2, 2020;

25 3. BANA's time to file papers in response to the Motion to Unseal is extended from
26 June 18, 2020 to June 25, 2020;

27 4. Plaintiff's time to file reply papers in further support of the Motion to Unseal is
28 extended from June 25, 2020 to July 6, 2020.

1 **IT IS SO STIPULATED.**

2 Dated: June 15, 2020

DATED: June 15, 2020

3 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

4 /s/ Robert G. Bernhoft (with permission)

/s/ Kiah D. Beverly-Graham

5 Robert G. Bernhoft, Esq.

Amy F. Sorenson, Esq.

6 Admitted *Pro Hac Vice*

Nevada Bar No. 12495

7 Wisconsin Bar No. 1032777

Blakeley E. Griffith, Esq.

8 Thomas E. Kimble, Esq.

Nevada Bar No. 12386

9 Admitted *Pro Hac Vice*

Kiah D. Beverly-Graham, Esq.

10 Illinois Bar No. 6257935

Nevada Bar No. 11916

11 Daniel James Treuden, Esq.

3883 Howard Hughes Parkway, Suite 1100

12 Wisconsin Bar No. 1052766

Las Vegas, NV 89169

13 1402 E. Cesar Chavez Street

Attorneys for Defendant Bank of America,

14 Austin, Texas 78702

N.A.

15 Joel F. Hansen, Esq.

16 Nevada Bar No. 1876

17 Hansen & Hansen, LLC

18 9030 W. Cheyenne Avenue, #210

19 Las Vegas, Nevada 89129

20 *Attorneys for Plaintiffs*

21 **ORDER**

22 **IT IS HEREBY ORDERED** that BANA's time to file papers in response to the Motion
23 to Compel is extended from June 16, 2020 to June 22, 2020;

24 **IT IS FURTHER ORDERED** that Plaintiffs' time to file reply papers in further support
25 of the Motion to Compel is extended from June 26, 2020 to July 2, 2020;

26 **IT IS FURTHER ORDERED** that BANA's time to file papers in response to the Motion
27 to Unseal is extended from June 18, 2020 to June 25, 2020; and

28 **IT IS FURTHER ORDERED** that Plaintiff's time to file reply papers in further support
of the Motion to Unseal is extended from June 25, 2020 to July 6, 2020.

UNITED STATES MAGISTRATE JUDGE

DATED: June 16, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER EXTENDING DEADLINES FOR BRIEFING ON DISCOVERY MOTIONS (SECOND REQUEST)** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: June 15, 2020

/s/ Lara J. Taylor
An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer
L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702-784-5200